

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS
CENTRAL DIVISION

LANDWORKS CREATIONS, LLC.)	C.A. NO.05-CV-40072 FDS
)	
Plaintiff)	
)	
v.)	
)	
UNITED STATES FIDELITY AND GUARANTY)	
COMPANY and)	
LOVETT-SILVERMAN CONSTRUCTION)	
CONSULTANTS, INC.)	
)	
Defendants)	
)	

PLAINTIFF LANDWORKS, LLC.'S EXPERT DISCLOSURE
PURSUANT TO F.R.C.P. 26(a)(2)

Now comes the Plaintiff, Landworks Creations, LLC, and discloses its expert pursuant to F.R.C.P. 26(a)(2)(A) and F.R.C.P. 26(a)(2)(B). The Plaintiff will call William Gallagher, of One Homestead Drive in Medway as its expert witness.

Mr. Gallagher has previously provided a ten page affidavit which was appended to the Plaintiff's Opposition to Defendant, Lovett-Silverman's Motion for Summary Judgment. The affidavit is his written report and was signed by him. This affidavit, which included Mr. Gallagher's curriculum vitae, provided his background and areas of expertise, the documents and materials which he reviewed and relied upon in preparing his expert opinions, the identity of witnesses interviewed and his expert opinions derived from his investigation. As is noted on the curriculum vitae, Mr. Gallagher has published no articles, and has not testified as an expert witness before. His fee for producing his report was \$125/hr. Mr. Gallagher was also

identified and disclosed in the final supplemental answers of the Plaintiff to interrogatories, which was served on all parties on April 7, 2007.

Respectfully Submitted,
Landworks Creations, LLC
By its attorney,

s/Robert N. Meltzer
The Mountain States Law Group
Robert N. Meltzer, BBO #564745
P.O. Box 1459
Framingham, MA 01701
Phone: (508) 872-7116

Dated: June 15, 2007

CERTIFICATE OF SERVICE

I, Robert N. Meltzer, do hereby certify that on this 15th day of June, 2007 I served a copy of the foregoing on the following counsel of record by first class mail, postage prepaid:

Hermes, Netburn, O'Connor & Spearing
265 Franklin Street, Seventh Floor
Boston, MA 02109
Attn: Eric Hipp, Esq.

Donovan Hatem
World Trade Center East
Two Seaport Lane
Boston, MA 02210
Attn: Julie Ciollo, Esq.

s/Robert N. Meltzer
Robert N. Meltzer